

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

STATE OF MISSOURI,
STATE OF GEORGIA,
STATE OF ALABAMA
STATE OF ARKANSAS,
STATE OF FLORIDA,
STATE OF NORTH DAKOTA, and
STATE OF OHIO

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION,

MIGUEL A. CARDONA, in his official
capacity as Secretary, United States
Department of Education, and

JOSEPH R. BIDEN, Jr., in his official
capacity as President of the United States,

Defendants.

Civil Action No. 2:24-cv-00103-LGW-BWC

MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Plaintiff States move this Court for an order allowing them to exceed the 26-page limit imposed by Local Rule 7.1(a) for their Memorandum in Support of their Combined Motion for Stay/Preliminary Injunction/Temporary Restraining Order. The States move the Court to extend the page limit to allow them to file a brief totaling 56 pages.

An extension is needed because Plaintiff States seek emergency relief and assert four counts challenging the Federal Government's imminent attempt to unlawfully cancel hundreds of billions of dollars in student loans. This is Defendants' third attempt in as many years to

fundamentally restructure the American student loan landscape by executive fiat. As explained in the briefing, the States will face imminent harm absent relief.

To show entitlement to relief, the Plaintiff States must explain the complicated national student loan industry, Defendants' authority under the Higher Education Act of 1965 and its many amendments, as well as Defendants' three attempts to mass cancel student loans. This lawsuit raises constitutional, statutory, and procedural claims, and it develops several theories of standing.

In short, the issues raised in the Plaintiff States' memorandum are complex and significant, and so require more than 26 pages to explain. When Plaintiff States sued earlier this year over the second attempt at mass loan cancellation, the States sought and received an extension to 55 pages, about the same request the States seek here. *Missouri v. Biden*, No. 24-cv-520, ECF 8, 9 (E.D. Mo. 2024).¹ An extension of similar length is needed here. *See, e.g., In re ValuJet, Inc.*, 984 F. Supp. 1472, 1476 (N.D. Ga. 1997) ("The Court recognizes that the issues presented in this large and complex case will necessitate briefs that exceed the page limitations.").

Plaintiff States' filing is a combined motion for stay, motion for a preliminary injunction, and motion for a temporary restraining order and a brief in support. Plaintiff States respectfully request that the Court allow them to file a Brief in Support of their Combined Motion totaling 56 pages in length.

¹ <https://storage.courtlistener.com/recap/gov.uscourts.moed.211135/gov.uscourts.moed.211135.8.0.pdf>

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CHRISTOPHER M. CARR
Attorney General of Georgia

Stephen J. Petranj

Solicitor General

Office of the Attorney General

40 Capitol Square, SW

Atlanta, Georgia 30334

(404) 458-3408

spetrany@law.ga.gov

/s/ G. Todd Carter

G. Todd Carter, Esq.

Georgia Bar No: 113601

Special Assistant Attorney General

Office of the Georgia

Attorney General

Brown, Readdick, Bumgartner,

Carter, Strickland & Watkins, LLP

5 Glynn Avenue

P. O. Box 220

Brunswick, GA 31521-0220

Tel: 912-264-8544

Fax: 912-264-9667

tcarter@brbcs.com

Respectfully Submitted,

ANDREW BAILEY

Attorney General of Missouri

/s/ Joshua M. Divine

Joshua M. Divine*

Solicitor General

Reed C. Dempsey*

Deputy Solicitor General

Missouri Attorney General's Office

Post Office Box 899

Jefferson City, MO 65102

Tel. (573) 751-1800

Fax. (573) 751-0774

josh.divine@ago.mo.gov

reed.dempsey@ago.mo.gov

*Pro hac vice pending

STEVE MARSHALL
Attorney General of Alabama

/s/ Edmund G. LaCour Jr.
Edmund G. LaCour Jr.*
Solicitor General
Office of the Attorney General
State of Alabama
501 Washington Avenue
P.O. Box 300152
Montgomery, AL 36130-0152
(334) 242-7300
Edmund.LaCour@AlabamaAG.gov

*Pro hac vice pending

TIM GRIFFIN
Attorney General of Arkansas

/s/Nicholas Bronni
Nicholas J. Bronni*
Solicitor General
Dylan L. Jacobs*
Deputy Solicitor General
Office of the Arkansas Attorney General
323 Center Street, Suite 200
Little Rock, AR 72201
(501) 682-3661
Nicholas.Bronni@arkansasag.gov
Dylan.Jacobs@arkansasag.gov

*Pro hac vice pending

ASHLEY MOODY
Attorney General of Florida

/s/James H. Percival
James H. Percival*
Chief of Staff
Office of the Attorney General
The Capitol, Pl-01
Tallahassee, Florida 32399-1050
(850) 414-3300
(850) 410-2672 (fax)
james.percival@myfloridalegal.com

*Pro hac vice pending

DREW H. WRIGLEY
Attorney General of North Dakota

/s/ Philip Axt
Philip Axt*
Solicitor General
North Dakota Attorney General's Office
600 E. Boulevard Ave., Dept. 125
Bismarck, ND 58505
Telephone: (701) 328-2210
pjaxt@nd.gov

*Pro hac vice pending

DAVE YOST
Attorney General of Ohio

/s/ T. Elliot Gaiser
T. Elliot Gaiser*
Solicitor General
Mathura J. Sridharan*
Deputy Solicitor General
Office of the Attorney General
365 East Broad Street
Columbus, Ohio 43215
Phone: (614) 466-8980
thomas.gaiser@ohioago.gov

*Pro hac vice pending